

1700 G Street NW,  
Washington, DC 20552



December 17, 2018

**Filed Via ECF**

The Honorable Robert D. Mariani  
U.S. District Court, Middle District of Pennsylvania  
William J. Nealon Federal Bldg. & U.S. Courthouse  
235 N. Washington Avenue  
Scranton, PA 18503

Re: *CFPB v. Navient Corp., et al.*, Case No. 3:17-CV-00101-RDM

Dear Judge Mariani:

I write on behalf of the Bureau regarding section 1 of Your Honor's December 10, 2018 Order (Doc. 132). The Bureau consents to appointment of a Special Master to (1) assess the sufficiency of the Bureau's categorical privilege assertions for the 35 disputed categories referenced in that Order and (2) as necessary, to conduct an *in camera* inspection of the documents covered by the 35 categories.

Respectfully submitted,

/s/ Nicholas Lee